



U.S. Department of Justice

United States Attorney
District of New Jersey
Civil Division

ALINA HABBA
UNITED STATES ATTORNEY

Angela E. Juneau
Assistant United States Attorney

970 Broad Street, Suite 700
Newark, NJ 07102
angela.juneau@usdoj.gov

main: (973) 645-2700
direct: (862) 240-2409

April 26, 2025

Via Electronic Filing

Hon. Madeline Cox Arleo, U.S.D.J.
Martin Luther King Bldg. & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: *Doe #1 v. Trump, et al.*, Civ. No. 25-2825 (MCA) (LDW)

Dear Judge Arleo:

This office represents Defendants in this matter. I respectfully write, pursuant to the Court's April 25, 2025 Order. ECF No. 28.

As set forth in Plaintiff's April 26, 2025 letter, Plaintiff's SEVIS record was restored on April 22, 2025. ECF No. 29 at 2. Further, as noted by the Court, ICE is working on a new policy and has agreed, in the interim, to restore the SEVIS records of similarly situated plaintiffs. *Id.*

Plaintiff nevertheless asks, both in their reply brief and in today's letter, to convert the motion for a restraining order to a motion for summary judgment. *Id.* Defendants respectfully oppose this application. Defendants' response to Plaintiff's Complaint is currently due on June 14, 2025. If the Court is inclined to accelerate Defendants' response to the Complaint, Defendants respectfully request that they be granted at least three weeks from today's date to respond.

Further, Plaintiff insists that the issue of Plaintiff's deportation is not resolved because Plaintiff's F-1 visa is revoked, which subjects them to deportation. ECF No. 29 at 3. But as Plaintiff alleged in their complaint, "Plaintiff does not challenge the revocation of their visa in this action." *See* Complaint ¶ 9. Plaintiff's claims are limited to their SEVIS record, thus, because Plaintiff's SEVIS record has been reinstated, Plaintiff's request for emergent injunctive relief is moot.

Thank you for your consideration of this matter.

Respectfully submitted,

ALINA HABBA
United States Attorney

By: s/ Angela E. Juneau
ANGELA E. JUNEAU
Assistant United States Attorney

Cc: All counsel of record (via ECF)